

# **EXHIBIT 7**

**Version with  
confidentiality  
designations  
removed of  
Dkt. 1112-23**

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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ABDELKARIM  
MARDINI IN SUPPORT OF GOOGLE'S  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR AN AWARD OF ATTORNEYS'  
FEES, COSTS, AND SERVICE AWARDS**

Judge: Hon. Yvonne Gonzalez Rogers

Date: August 7, 2024

Time: 2:00 p.m.

Location: Courtroom 1 – 4th Floor

1 **DECLARATION OF ABDELKARIM MARDINI**

2 I, AbdelKarim Mardini, declare as follows:

3 1. I am currently a Product Lead for Chrome Browser Trust & Safety at Google. I have  
4 been employed at Google for the last 14 years. As a result of my role and responsibilities, I am  
5 familiar with the Chrome browser and its privacy features. In this declaration, I provide background  
6 regarding the timing and nature of Google's plan to deprecate third party cookies in Chrome  
7 generally and Incognito mode specifically. I also discuss the timing and nature of Google's plan to  
8 streamline its disclosures by deprecating the Chrome Privacy Notice and the Chrome Privacy  
9 Whitepaper.

10 **Third Party Cookies**

11 2. In January 2020, Google publicly announced its plan to "render third party cookies  
12 obsolete" over the coming years. Attached as **Exhibit 1** is a true and correct copy of a January 14,  
13 2020 Chromium Post available at [https://blog.chromium.org/2020/01/building-more-private-web-](https://blog.chromium.org/2020/01/building-more-private-web-path-towards.html)  
14 [path-towards.html](https://blog.chromium.org/2020/01/building-more-private-web-path-towards.html). This announcement was part of Google's ongoing efforts to enhance user  
15 privacy and security on the web.

16 3. In May 2020, Google announced that it would "start blocking third-party cookies by  
17 default within each Incognito session and include a prominent control on the New Tab Page."  
18 Attached as **Exhibit 2** is a true and correct copy of a May 19, 2020 Chrome blog post I wrote and  
19 which is available at [https://blog.google/products/chrome/more-intuitive-privacy-and-security-](https://blog.google/products/chrome/more-intuitive-privacy-and-security-controls-chrome/)  
20 [controls-chrome/](https://blog.google/products/chrome/more-intuitive-privacy-and-security-controls-chrome/). This project began in 2018 and was internally known as "Chromeguard." In the  
21 blog post, Google announced that "[t]his feature will gradually roll out, starting on desktop operating  
22 systems and on Android." *Id.* Initially, the goal was to have the features rolled out to all Incognito  
23 users over the following one to two months.

24 4. By June 2, 2020, which I understand is when Plaintiffs' filed this lawsuit, the features  
25 had already been rolled out to 20% of users. Google rolled the features out to 50% of users by June  
26 22, 2020, and to all users by July 13, 2020.

27 5. Google never had any intention of reversing the default third-party cookie blocking  
28 feature in Incognito. To the contrary, as demonstrated by Google's January 2020 public

1 announcement—and numerous public announcements since, including those included as **Exhibits**  
2 **3–7 hereto**—Google is leading the charge to deprecate third-party tracking cookies from the internet  
3 altogether, not just for Incognito.

4 6. Attached as **Exhibit 3** is a true and correct copy of a Google Developer page about  
5 Google’s “Privacy Sandbox” initiative, available at [https://developers.google.com/privacy-](https://developers.google.com/privacy-sandbox/overview)  
6 [sandbox/overview](https://developers.google.com/privacy-sandbox/overview). The webpage explains that the Privacy Sandbox Initiative “aims to create  
7 technologies that both protect people’s privacy online and give companies and developers tools to  
8 build thriving digital businesses,” and that its core aims include: “[p]has[ing] out support for third-  
9 party cookies when new solutions are in place.” *Id.*

10 7. Attached as **Exhibit 4** is a true and correct copy of a webpage that lists numerous  
11 blog posts about the Privacy Sandbox initiative, available at [https://developers.google.com/privacy-](https://developers.google.com/privacy-sandbox/blog)  
12 [sandbox/blog](https://developers.google.com/privacy-sandbox/blog).

13 8. Attached as **Exhibit 5** is a true and correct copy of a November 30, 2021 blog post,  
14 available at [https://developers.google.com/privacy-sandbox/blog/progress-in-the-privacy-sandbox-](https://developers.google.com/privacy-sandbox/blog/progress-in-the-privacy-sandbox-2021-11?hl=en)  
15 [2021-11?hl=en](https://developers.google.com/privacy-sandbox/blog/progress-in-the-privacy-sandbox-2021-11?hl=en). This blog post “track[ed] the milestones on the path to phasing out third-party  
16 cookies in Chrome and working towards a more private web.”

17 9. Attached as **Exhibit 6** is a true and correct copy of an October 11, 2023 blog post  
18 titled “Preparing for the end of third-party cookies,” available at  
19 <https://developers.google.com/privacy-sandbox/blog/cookie-countdown-2023oct?hl=en>.

20 10. Attached as **Exhibit 7** is a true and correct copy of a December 14, 2023 blog post  
21 titled “The next step toward phasing out third-party cookies in Chrome,” available at  
22 <https://blog.google/products/chrome/privacy-sandbox-tracking-protection/>.

### 23 **Chrome Privacy Notice and Chrome Whitepaper**

24 11. In or around 2021, the Chrome team at Google began considering whether to  
25 deprecate the Chrome Privacy Notice—in part to streamline the information provided to Chrome  
26 users. Following several rounds of input from stakeholders at Google, it decided to deprecate the  
27 Chrome Privacy Notice, but had not decided on a firm date for doing so. Ultimately, the Chrome  
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1 Privacy Notice was deprecated on October 4, 2023. Google also deprecated the Chrome Whitepaper  
2 on February 22, 2024.

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4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct to the best of my knowledge. Executed on the 4th of June 2024 at  
6 Mountain View, California.

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DocuSigned by:  
  
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AbdelKarim Mardini

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